

REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 2-21 were pending in this application. Claims 3, 5, 17, and 19 have been cancelled, and claims 2, 4, 15, 18, and 20 have been amended. Accordingly, claims 2, 4, 6-16, 18, 20, and 21 will be pending herein upon entry of this Amendment. Support for the amendment to claims 2, 15, and 20 can be found, for example, in paragraphs 47 and 48 and in Figure 3 of the application. For the reasons stated below, Applicants respectfully submit that all claims pending in this application are in condition for allowance.

In the Office Action dated August 24, 2005, claims 2, 3, 4, 5, 6, 10, 12, 13, 14, 15, 17, 18, 19, 20, and 21 were rejected under 35 U.S.C. §102 (e) as being anticipated by O'Brien et al. U.S. Patent No. 6,658,571 (hereinafter "O'Brien et al."). This ground of rejection is respectfully traversed.

Independent claims 2, 15, and 20 have been amended to recite the steps by which a "first device driver" is created, a "first process creation wrapper" is installed, and an operating system table is modified to cause a dispatcher to call the "first process creation wrapper" before a "process creation function" of the operating system. Similar steps were previously found in claims 3 and 17, which have now been cancelled.

To even further distinguish independent claims 2, 15, and 20 from O'Brien et al., those claims have been amended to recite "wherein the first process creation wrapper function and one or more subsequent process creation wrapper functions installed by one or more subsequent

device drivers are modifiable so that the one or more subsequent process creation wrapper functions are added and removed serially between the first process creation wrapper function and the process creation function and the one or more subsequent process creation wrapper functions are called by the dispatcher before the process creation function.” This “serialization” or “chain” of subsequent wrapper functions is described in paragraphs 45 and 48 of the application and is depicted as a linked list in Figure 3 of the application.

In contrast, O'Brien et al., do not install the “security modules” as a “chain” or linked list between the system call table (ST) and a system call. Instead, O'Brien et al. install a security module system call table (SM_SCT) between the system call table (ST) and a system call, col. 5 lines 31- 46. Also, it would not be possible for O'Brien et al. to implement its security modules as a “chain” or linked list that is terminated by the system call, because each security module contains pre-processing and post-processing software, col. 5 lines 40-42. In other words, it must be possible to execute each security module before and after the system call and not just before. O'Brien et al. explicitly teach away from amended independent claims 2, 15, and 20. Therefore, O'Brien et al. do not teach or suggest “the first process creation wrapper function and one or more subsequent process creation wrapper functions installed by one or more subsequent device drivers are modifiable so that the one or more subsequent process creation wrapper functions are added and removed serially between the first process creation wrapper function and the process creation function and the one or more subsequent process creation wrapper functions are called by the dispatcher before the process creation function.” As a result, O'Brien et al. do not disclose or suggest all of the elements of amended independent claims 2, 15, and 20.

Since O'Brien et al. do not disclose or suggest all of the elements of amended independent claims 2, 15, and 20, amended independent claims 2, 15, and 20 are believed to be allowable over O'Brien et al. Dependent claims 4, 6, 10, 12-14, 18, and 21 are also believed to be allowable over O'Brien et al. for at least the same reasons set forth above.

It is noted that dependent claims 4 and 18 have been amended to recite "the first device driver" to correspond to "the first device driver" recited in amended independent claims 2 and 15, respectively.

Claims 7, 8, 9, and 11 were rejected under 35 U.S.C. §103(a) as being unpatentable over O'Brien et al. in further view of Shostack et al. U.S. Patent No. 6,298,445 (hereinafter "Shostack et al.") in further view of Gooderum et al. U.S. Patent No. 6,219,707 (hereinafter "Gooderum et al."). This ground of rejection is respectfully traversed.

Applicants respectfully submit that neither Shostack et al. nor Gooderum et al. overcome the deficiencies of O'Brien et al. Accordingly, dependent claims 7, 8, 9, and 11 should also be in condition for allowance.

Claim 16 was rejected under 35 U.S.C. §103(a) as being unpatentable over O'Brien et al. in further view of Gooderum et al. This ground of rejection is respectfully traversed. As noted above, Gooderum et al. do not overcome the deficiencies of the primary cited reference. As such, claim 16 should also be patentable over the prior art of record.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is

Serial No.: 09/821,754
Art Unit: 2134

Attorney's Docket No.: CIG-101
Page 12

desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

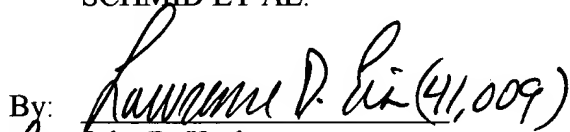
PILLSBURY WINTHROP
SHAW PTTMAN LLP
1650 Tysons Boulevard
McLean, VA 22102
Tel: 703/770-7900

Date: November 23, 2005

LDE/JRK/dkp

Respectfully submitted,
SCHMID ET AL.

By:


John R. Kasha
Registration No. 53,100

Customer No. 00909